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Mr. Michael Ribordy
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Subject
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Time-Critical Removal Action – Former Plainwell Impoundment
Monthly Report (June 2008)

INDUSTRIAL

Dear Mike:

Attached is the 16th monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Time-Critical Removal Action (TCRA). This progress report is submitted in accordance with Section 19A of the February 2007 Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action (Docket No. V-W-07-C-863).

If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS

Stephen Garbaciak Jr., P.E.
Vice President

Date
July 15, 2008

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MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/ KALAMAZOO RIVER SUPERFUND SITE TIME-CRITICAL REMOVAL ACTION – FORMER PLAINWELL IMPOUNDMENT

REPORT #16, JUNE 2008

PREPARED BY ARCADIS
JULY 15, 2008

ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP

SUBMITTED TO

MICHAEL RIBORDY, ON-SCENE COORDINATOR
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Monthly Report for the Allied Paper, Inc./Portage Creek/ Kalamazoo River Superfund Site TCRA – Former Plainwell Impoundment

REPORT #16, JUNE 2008

Significant Developments and Activities During the Period

- On June 2, the United States Environmental Protection Agency (USEPA) approved the revised bank stabilization plan for Removal Areas 6B and 7B; the plan was submitted to USEPA by the Kalamazoo River Study Group (KRSG) in May
- On June 3, the KRSG submitted a copy of the *49th Weekly Construction Report for the Plainwell TCRA* to USEPA and the Michigan Department of Environmental Quality (MDEQ).
- On June 9, the KRSG submitted sample coordinate data for Removal Area 6B to USEPA.
- On June 9, the KRSG submitted to USEPA contract drawings detailing the planned approach for removal activities in Removal Area 11B.
- On June 9, the KRSG submitted to USEPA a request from Aggregate Industries for a letter that acknowledges Aggregate Industries' cooperation during the Plainwell TCRA. USEPA instructed Aggregate Industries to contact them directly.
- On June 9 and 18, the KRSG submitted copies of analytical data from TCRA sampling activities to USEPA.
- On June 10, the KRSG submitted a copy of the *50th Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ.
- On June 13 and 30, the KRSG received copies of analytical data for the polychlorinated biphenyl (PCB) soil confirmation split samples collected by USEPA.
- On June 16, the KRSG received written confirmation from MDEQ that the carbon in the water treatment system located at Staging Area 4N did not need to be replaced.
- On June 16, the KRSG submitted the *15th Monthly Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site TCRA* for May 2008 to USEPA.
- On June 17, the KRSG received information from MDEQ regarding correspondence with Michigan Gas Utilities and Consumers Energy regarding excavation activities near the utility line crossing in Removal Areas 10A and 10B, and in the Mid-Channel Area C area.
- On June 18, the KRSG, USEPA, MDEQ, United States Fish and Wildlife Service (USFWS), and Michigan Department of Natural Resources (MDNR) attended the Monthly Stakeholder's Meeting in Plainwell.

Monthly Report for the Allied Paper, Inc./Portage Creek/ Kalamazoo River Superfund Site TCRA – Former Plainwell Impoundment

REPORT #16, JUNE 2008

- On June 18, the KRSG submitted the 2008 *Traffic Control Plan*: *Addendum 1 – Alternate Route to C&C Landfill and Wayne Disposal* to USEPA, MDEQ, the City of Plainwell, and the City of Otsego.

Data Collected and Field Activities Conducted During the Period

- During the week of June 2, the KRSG continued excavating soil and sediment in Removal Areas 10A, 10B, and 11B; continued excavating floodplain soils in Removal Areas 11A, 12A, and 13A; removed soil identified by MDEQ in three locations in Removal Areas 6B and 7B; completed relocation of the pug mill and water treatment system from Staging Area 3S to Staging Area 5S; continued restoration activities in Removal Area 10A; completed the installation of an erosion protection system in Removal Area 7B; continued operating the water control structure (WCS); and removed the haul roads in Removal Areas 2A, 3A, and 4A, and seeded the areas where haul roads were removed. Six soil confirmation samples (TS20070 through TS20075) were collected from Removal Area 10A for PCB analysis. Two surface water samples (TS30034 and TS30035) were collected from locations 300 feet downstream and 200 feet upstream, respectively, of Removal Area 11B for PCB analysis. A rinse blank (TS30036) was also collected. Table A summarizes the samples collected. Solidified material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan, C&C Landfill in Marshall, Michigan (non-TSCA material), or Wayne County Landfill in Belleview, Michigan (TSCA material) for disposal.

- During the week of June 9, the KRSG continued excavating soil and sediment in Removal Areas 10B and 11B; continued excavating floodplain soils in Removal Areas 11A, 12A, and 13A; continued restoration activities in Removal Areas 9A and 10A; and continued operation of the WCS. Six soil confirmation samples (TS20076 through TS20081) were collected from Removal Area 11B for PCB analysis. The USEPA collected a split sample of TS20076 (APS-060908-21-SD/TS20076) Two surface water samples (TS30037 and TS30038) were collected from locations 300 feet downstream and 200 feet upstream, respectively, of Removal Area 11B for PCB analysis. A rinse blank (TS30039) was also collected. Four sets of wastewater samples (W_SA4N_X_0003, W_SA4N_X_0004, W_SA4N_X_0005, and W_SA4N_X_0006) were collected from the water treatment system located at Staging Area 4N. Each set of wastewater samples consists of one influent (e.g., W_SA4N_Influ_0003), two mid-point (e.g., W_SA4N_MidA_0004 and W_SA4N_MidB_0004), and two effluent samples (e g., W_SA4N_EffluA_0006 and W_SA4N_EffluB_0006). Two duplicate effluent samples (W_SA4N_Dup_0001 and W_SA4N_Dup_0002) were also collected. Six sets of wastewater samples (W_SA5S_X_0001 through W_SA5S_X_0006) were collected from the water treatment system located at Staging Area 5S. One duplicate effluent sample (W_SA5S_Dup_0001) was also collected. Table A summarizes the samples collected. Solidified material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan, C&C Landfill in Marshall, Michigan (non-TSCA material), or Wayne County Landfill in Belleview, Michigan (TSCA material) for disposal.

**Monthly Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site TCRA – Former Plainwell Impoundment**

REPORT #16, JUNE 2008

- During the week of June 16, the KRSG continued excavating soil and sediment in Removal Areas 10B and 12B; continued excavating floodplain soils in Removal Areas 11A, 12A, and 13A; continued restoration activities in Removal Areas 7, 8, 9A, 9B, 10A, and 11B; and continued operation of the WCS. Seven soil confirmation samples (TS20082 through TS20087 and TS20089) were collected from Removal Area 10B and Upland Area 10B1 for PCB analysis. A duplicate of sample TS20087 (TS20088) was also collected. Two surface water samples (TS30040 and TS30041) were collected from locations 300 feet downstream and 200 feet upstream, respectively, of Removal Area 12B for PCB analysis. A rinse blank (TS30042) was also collected. One set of wastewater samples (W_SA4N_X_0007) was collected from the water treatment system located at Staging Area 4N. Two PCB wipe samples (Frac Tank 01 and Frac Tank 02) were collected from the temporary holding tanks used at Staging Areas 4N and 5S, respectively, to confirm that the tanks had been properly decontaminated prior to demobilization. These temporary holding tanks were used during the week of June 9 in addition to the holding tanks regularly located at the Staging Areas to support higher than normal water treatment volumes caused by heavy rainfall. Table A summarizes the samples collected. Solidified material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan, C&C Landfill in Marshall, Michigan (non-TSCA material), or Wayne County Landfill in Belleview, Michigan (TSCA material) for disposal.

- During the week of June 23, the KRSG continued excavating soil and sediment in Removal Areas 10B, 11A and 12B, and in Upland Area 10B1; continued excavating floodplain soils in Removal Areas 12A and 13A; continued restoration activities in Removal Areas 8, 9B, 10B, and 11B; and continued operation of the WCS. Eleven soil confirmation samples (TS20090 through TS20100) were collected from Removal Area 12B and Upland Area 10B1 for PCB analysis. The USEPA collected a split sample of TS20090 (APS-062408-30-SD/TS20090). Two surface water samples (TS30043 and TS30044) were collected from locations 300 feet downstream and 200 feet upstream, respectively, of Removal Area 12B for PCB analysis. A rinse blank (TS30045) was also collected. Table A summarizes the samples collected. Solidified material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan, C&C Landfill in Marshall, Michigan (non-TSCA material), or Wayne County Landfill in Belleview, Michigan (TSCA material) for disposal.

- On June 30, the KRSG continued excavating in Removal Areas 10B and 11B, and in Upland Area 10B1. Three soil confirmation samples (TS20101 through TS20103) were collected from Upland Area 10B1 for PCB analysis. The USEPA collected a split sample of TS20101 (APS-063008-31-SD/TS20101). Table A summarizes the samples collected. Solidified material from the staging areas was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan, C&C Landfill in Marshall, Michigan (non-TSCA material), or Wayne County Landfill in Belleview, Michigan (TSCA material) for disposal.

- As of June 30, approximately 72,000 cubic yards of material had been excavated from Removal Areas 1, 2A and 2B, 3A and 3B, 4A and 4B, 5, 6A and 6B, 7, 8, 9A, 9B, 10A, 10B, 11A, 11B, 12A, 12B, 13A, 13B, Mid-Channel Area C, the Phase 1 Cofferdam Area, Upland Areas 3A1, 3A2, 4A1, 6B1, 10B1, 11A1, and 12A1, and Islands 1, 2 and 3.

Laboratory Data Received During the Period

- During the week of June 2, the KRSG received analytical data for soil confirmation samples TS20070 through TS20075, surface water samples TS30028 through TS30030 (collected in May), and wastewater sample set W_SA4N_X_0002 (collected in May).

- During the week of June 9, the KRSG received analytical data for soil confirmation samples TS20076 through TS20079, USEPA split sample APS-060908-21-SD/TS20076, surface water samples TS30031 through TS30033 (collected in May), wastewater sample sets W_SA4N_X_0003, W_SA4N_X_0004, and W_SA5S_X_0001 through W_SA5S_X_0005, and duplicate samples W_SA4N_Dup_0001 and W_SA5S_Dup_0001.

- During the week of June 16, the KRSG received analytical data for soil confirmation samples TS20080 through TS20089, surface water samples TS30034 through TS30036, wastewater sample sets W_SA4N_X_0005 through W_SA4N_X_0007 and W_SA5S_X_0006, duplicate sample W_SA4N_Dup_0002, and PCB wipe samples Frac Tank 01 and Frac Tank 02.

- During the week of June 23, the KRSG received analytical data for soil confirmation samples TS20090 through TS20097.

- On June 30, the KRSG received analytical data for soil confirmation samples TS20098 through TS20100, USEPA split sample APS-062408-30-SD/TS20090, and surface water samples TS30037 through TS30039.

- The KRSG is awaiting analytical results for soil confirmation samples TS20101 through TS20103, USEPA split sample APS-063008-31-SD/TS20101, and surface water samples TS30040 through TS30045

Issues Encountered and Actions Taken

- In May, the KRSG submitted a revised approach to the bank stabilization plan that utilized topsoil, river run rock, and coir logs for Removal Area 7 to USEPA and MDEQ. USEPA approved the plan, and the erosion protection system was installed during the week of June 2.

- On June 5, the USEPA and MDEQ temporarily suspended river run rock installation in Removal Area 7 due to a visible silt plume in the water. After consulting with the MDNR, the agencies communicated verbally that unless the cloud was a dark black shade or present throughout the whole river, it was permissible to continue with installation. River run rock placement continued later that day.

- PCBs were detected in both mid-point samples (W_SA4N_MidA_0003 and W_SA4N_MidB_0003) and in one of the effluent samples (W_SA4N_EffluB_0003, and its duplicate) collected from the water treatment system located at Staging Area 4N on June 9. The water was held in a storage tank and was not discharged. According to Substantive Requirements Document (SRD) MIU990025, if PCBs are detected in the mid-point sample, then the carbon in the carbon vessels must immediately be changed because the carbon's adsorptive capability had likely been exceeded. However, at the time the sample was collected, less than 100,000 gallons of water had been treated at the water treatment system, making it unlikely that the carbon's adsorptive capability was exceeded. The KRSG consulted with the MDEQ and concluded that other factors likely caused the PCB detection in the mid-point and effluent samples. The carbon vessels were back flushed to ensure that the carbon was properly compacted and that channelization did not occur. The water initially treated on June 9 was retreated and resampled on June 14 prior to being discharged on June 18. PCBs were not detected in any of the samples collected on June 14. This information was provided verbally to MDEQ on June 13. The MDEQ did not recommend any additional response measures (such as changing out the carbon), and because the water was not discharged, the treatment system was in compliance with the SRD. No written reports were required. On June 16, the KRSG received written confirmation from the MDEQ that no further actions or written reports were required.

- Low concentrations of PCBs were detected in surface water samples TS30031 (collected on May 29) and TS30037 (collected on June 12), which were collected from 300 feet downstream of Removal Areas 10B and 11B, respectively. No elevated turbidity readings were recorded on May 29, June 12, or throughout excavation activities in Removal Area 10B or 11B.

Developments Anticipated During the Next Reporting Period

- During the week of July 1, the KRSG is scheduled to continue excavation activities in Removal Areas 11A, 12A, and 12B, continue restoration activities in Removal Areas 10B, 11B, and 12B, operate the WCS, and continue loading and transporting solidified material to the appropriate landfill.

- During the week of July 7, the KRSG is scheduled to continue excavation activities in Removal Areas 11A, 12A, and 12B, continue restoration activities in Removal Areas 10B, 11B, and 12B, operate the WCS, and continue loading and transporting solidified material to the appropriate landfill.

- During the week of July 14, the KRSG is scheduled to continue excavation activities in Removal Areas 11A, 12A, and 13A, continue restoration activities in Removal Areas 11A, 11B, and 12B,

operate the WCS, complete the installation of turbidity controls for the Mid-Channel Area B area, and continue loading and transporting solidified material to the appropriate landfill.

- During the week of July 21, the KRSG is scheduled to continue excavation activities in Removal Areas 11A, 12A, 13A, and Mid-Channel Area B, continue restoration activities in Removal Areas 11A, 11B, and 12B, operate the WCS, and continue loading and transporting solidified material to the appropriate landfill.

- During the week of July 28, the KRSG is scheduled to continue excavation activities in Removal Areas 12A, 13A, 13B, and Mid-Channel Area B, continue restoration activities in Removal Areas 11A, 11B, and 12B, operate the WCS, and continue loading and transporting solidified material to the appropriate landfill.

- The KRSG will continue to submit the *Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ in July.

- The KRSG will continue to submit copies of analytical data from TCRA sampling activities to USEPA in July.

- Throughout July, the KRSG will, as necessary, continue to submit Subcontractor Qualification Notifications to USEPA, as required by Paragraph 11 of the TCRA AOC.

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Former Plainwell Impoundment TCRA
Monthly Report #16, June 2008

Table A — Summary of Samples Collected and Data Received in June 2008

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
					Soil Confirmation Samples				
TS20070	06/02/08	06/03/08	082159	KAR Labs	RA 10A, Grid 6	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20071					RA 10A, Grid 7	PCBs	1 4 mg/kg	5 mg/kg	None
TS20072					RA 10A, Grid 7 TSCA	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20073		06/04/08	082161	KAR Labs	RA 10A, 6 (BS)	PCBs	0 55 mg/kg	5 mg/kg	None
TS20074					RA 10A, 7 (BS)	PCBs	0 55 mg/kg	5 mg/kg	None
TS20075					RA 10A, 7 (BS) TSCA	PCBs	1 7 mg/kg	5 mg/kg	None
TS20076 [1]	06/09/08	06/11/08	082259	KAR Labs	RA 11B, Grid 5 (BS)	PCBs	< 0 33 mg/kg	5 mg/kg	None
APS-060908-21-SD/TS20076		***06/13/08***	***0806174***	***TriMatrix Laboratories***		***PCBs***	***< 0.081 mg/kg***	***5 mg/kg***	***None***
TS20077		06/11/08	082259	KAR Labs	RA 11B, Grid 4 (BS)	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20078					RA 11B, Grid 3 (BS)	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20079					RA 11B, Grid 2 (BS)	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20080	06/13/08	06/16/08	082351	KAR Labs	RA 11B, Grid 1 (BS)	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20081					RA 11B, Grid 1	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20082	06/16/08	06/17/08	082378	KAR Labs	RA 10B, Grid 8	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20083					RA 10B, Grid 8 TSCA	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20084	06/18/08	06/20/08	082418	KAR Labs	UA 10B1, Grid 6B TSCA	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20085					UA 10B1, Grid 4B TSCA	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20086					UA 10B1, Grid 5B TSCA	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20087 [TS20088]	06/19/08	06/20/08	082437	KAR Labs	UA 10B1, Grid 3B TSCA	PCBs [PCBs]	< 0 33 mg/kg [< 0 33 mg/kg]	5 mg/kg [5 mg/kg]	None [None]
TS20089					UA 10B1, Grid 2 TSCA	PCBs	0 34 mg/kg	5 mg/kg	None
TS20090 [1]	06/24/08	06/25/08	082489	KAR Labs	RA 12B, Grid 1 (BS)	PCBs	< 0 33 mg/kg	5 mg/kg	None
APS-062408-30-SD/TS20090		***06/30/08***	***0806496***	***TriMatrix Laboratories***		***PCBs***	***< 0.75 mg/kg***	***5 mg/kg***	***None***
TS20091		06/25/08	082489	KAR Labs	RA 12B, Grid 2 (BS)	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20092					RA 12B, Grid 3 (BS)	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20093					RA 12B, Grid 4 (BS)	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20094					RA 12B, Grid 5 (BS)	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20095	06/25/08	06/26/08	082537	KAR Labs	RA 12B, Grid 6 (BS)	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20096					RA 12B, Grid 7 (BS)	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20097					RA 12B, Grid 8 (BS)	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20098	06/27/08	06/30/08	082583	KAR Labs	UA 10B1, Grid 7A TSCA	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20099					UA 10B1, Grid 6A TSCA	PCBs	< 0 33 mg/kg	5 mg/kg	None
TS20100					UA 10B1, Grid 5A TSCA	PCBs	< 0 33 mg/kg	5 mg/kg	None

See Notes on Page 6

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Former Plainwell Impoundment TCRA
Monthly Report #16, June 2008

Table A — Summary of Samples Collected and Data Received in June 2008

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
Soil Confirmation Samples (continued)									
TS20101 [1]	06/30/08	NR	NR	KAR Labs	UA 10B1, Grid 3A TSCA	PCBs	-	-	-
APS-063008-31-SD/TS20101				*TriMatrix Laboratories*		*PCBs*	-	-	-
TS20102				KAR Labs	UA 10B1, Grid 4A TSCA	PCBs	-	-	-
TS20103					UA 10B1, Grid 9	PCBs	-	-	-
Surface Water Samples									
TS30028	05/22/08	06/04/08	TCRA 47	TAL	300' downstream RA 10A	PCBs	<0 052 mg/L	-	None
TS30029					200' upstream RA 10A	PCBs	<0 055 mg/L	-	None
TS30030					Rinse Blank	PCBs	<0 051 mg/L	-	None
TS30031	05/29/08	06/10/08	TCRA 49	TAL	300' downstream RA 10A	PCBs	0 036 mg/L J	-	None
TS30032					200' upstream RA 10A	PCBs	<0 061 mg/L	-	None
TS30033					Rinse Blank	PCBs	<0 054 mg/L	-	None
TS30034	06/05/08	06/18/08	TCRA 51	TAL	300' downstream RA 11B	PCBs	<0 054 mg/L	-	None
TS30035					200' upstream RA 11B	PCBs	<0 055 mg/L	-	None
TS30036					Rinse Blank	PCBs	<0 051 mg/L	-	None
TS30037	06/12/08	06/30/08	TCRA 53	TAL	300' downstream RA 11B	PCBs	0 029 mg/L J	-	None
TS30038					200' upstream RA 11B	PCBs	< 0 056 mg/L	-	None
TS30039					Rinse Blank	PCBs	< 0 056 mg/L	-	None
TS30040	06/19/08	NR	NR	TAL	300' downstream RA 12B	PCBs	-	-	-
TS30041					200' upstream RA 12B	PCBs	-	-	-
TS30042					Rinse Blank	PCBs	-	-	-
TS30043	06/26/08	NR	NR	TAL	300' downstream RA 12B	PCBs	-	-	-
TS30044					200' upstream RA 12B	PCBs	-	-	-
TS30045					Rinse Blank	PCBs	-	-	-
Wastewater Samples									
W_SA4N_Influ_0002	05/30/08	06/03/08	082160	KAR Labs	Staging Area 4N, Discharge 2, influent sample	PCBs	< 0 1 µg/L	No Action Limit	-
W_SA4N_MidA_0002					Staging Area 4N, Discharge 2, midpoint sample, right side	PCBs	< 0 1 µg/L	No Action Limit	-
W_SA4N_EffluA_0002					Staging Area 4N, Discharge 2, effluent sample, right side	PCBs, TSS, P	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L, P=0 15 mg/L, No Action Limit
W_SA4N_MidB_0002					Staging Area 4N, Discharge 2, midpoint sample, left side	PCBs	< 0.1 µg/L	No Action Limit	-
W_SA4N_EffluB_0002					Staging Area 4N, Discharge 2, effluent sample, left side	PCBs, TSS, P	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L, P=0 18 mg/L, No Action Limit

See Notes on Page 6

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Former Plainwell Impoundment TCRA
Monthly Report #16, June 2008

Table A — Summary of Samples Collected and Data Received in June 2008

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
Wastewater Samples (continued)									
W_SA4N_Influ_0003	06/09/08	06/10/08	082255	KAR Labs	Staging Area 4N, Discharge 3, influent sample	PCBs	0 13 µg/L	No Action Limit	-
W_SA4N_MidA_0003					Staging Area 4N, Discharge 3, midpoint sample, right side	PCBs	0 5 µg/L	No Action Limit	-
W_SA4N_EffluA_0003					Staging Area 4N, Discharge 3, effluent sample, right side	PCBs, TSS, P	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L, P=0 20 mg/L, No Action Limit
W_SA4N_MidB_0003					Staging Area 4N, Discharge 3, midpoint sample, left side	PCBs	0 3 µg/L	No Action Limit	-
W_SA4N_EffluB_0003					Staging Area 4N, Discharge 3, effluent sample, left side	PCBs, TSS, P	0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	Yes - Retreat Water, TSS = <4 mg/L, Action Limit = 45 mg/L, P=0 25 mg/L, No
[W_SA4N_Dup_0001]						[PCBs, TSS, P]	[0 1 µg/L]	[Monthly Average of 2 6 x 10-5 µg/L]	[Yes - Retreat Water, TSS = <4 mg/L, Action Limit = 45 mg/L, P=0 25 mg/L, No Action Limit]
W_SA4N_Influ_0004	06/10/08	06/11/08	082258	KAR Labs	Staging Area 4N, Discharge 4, influent sample	PCBs	0 6 µg/L	No Action Limit	-
W_SA4N_MidA_0004					Staging Area 4N, Discharge 4, midpoint sample, right side	PCBs	< 0 1 µg/L	No Action Limit	-
W_SA4N_EffluA_0004					Staging Area 4N, Discharge 4, effluent sample, right side	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA4N_MidB_0004					Staging Area 4N, Discharge 4, midpoint sample, left side	PCBs	< 0 1 µg/L	No Action Limit	-
W_SA4N_EffluB_0004					Staging Area 4N, Discharge 4, effluent sample, left side	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA4N_Influ_0005	06/13/08	06/16/08	082340	KAR Labs	Staging Area 4N, Discharge 5, influent sample	PCBs	< 0 1 µg/L	No Action Limit	-
W_SA4N_MidA_0005					Staging Area 4N, Discharge 5, midpoint sample, right side	PCBs	< 0 1 µg/L	No Action Limit	-
W_SA4N_EffluA_0005					Staging Area 4N, Discharge 5, effluent sample, right side	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA4N_MidB_0005					Staging Area 4N, Discharge 5, midpoint sample, left side	PCBs	< 0 1 µg/L	No Action Limit	-
W_SA4N_EffluB_0005					Staging Area 4N, Discharge 5, effluent sample, left side	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L

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Table A — Summary of Samples Collected and Data Received in June 2008

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
Wastewater Samples (continued)									
W_SA4N_Influ_0006	06/14/08	06/17/08	082363	KAR Labs	Staging Area 4N, Discharge 6, influent sample	PCBs	< 0 1 µg/L	No Action Limit	-
W_SA4N_MidA_0006					Staging Area 4N, Discharge 6, midpoint sample, right side	PCBs	< 0 1 µg/L	No Action Limit	-
W_SA4N_EffluA_0006					Staging Area 4N, Discharge 6, effluent sample, right side	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L
[W_SA4N_Dup_0002]						[PCBs, TSS]	[< 0 1 µg/L]	[Monthly Average of 2 6 x 10-5 µg/L]	[None TSS = <4 mg/L, Action Limit = 45 mg/L]
W_SA4N_MidB_0006					Staging Area 4N, Discharge 6, midpoint sample, left side	PCBs	< 0 1 µg/L	No Action Limit	-
W_SA4N_EffluB_0006					Staging Area 4N, Discharge 6, effluent sample, left side	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA4N_Influ_0007	06/16/08	06/17/08		KAR Labs	Staging Area 4N, Discharge 7, influent sample	PCBs, TSS	< 0 1 µg/L	No Action Limit	None TSS = <4 mg/L, No Action Limit
W_SA4N_MidA_0007					Staging Area 4N, Discharge 7, midpoint sample, right side	PCBs, TSS	< 0 1 µg/L	No Action Limit	None TSS = <4 mg/L, No Action Limit
W_SA4N_EffluA_0007					Staging Area 4N, Discharge 7, effluent sample, right side	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA4N_MidB_0007					Staging Area 4N, Discharge 7, midpoint sample, left side	PCBs, TSS	< 0 1 µg/L	No Action Limit	None TSS = <4 mg/L, No Action Limit
W_SA4N_EffluB_0007					Staging Area 4N, Discharge 7, effluent sample, left side	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA5S_Influ_0001	06/09/08	06/10/08	082242	KAR Labs	Staging Area 5S, Discharge 1, influent sample	PCBs	0 1 µg/L	No Action Limit	-
W_SA5S_MidA_0001					Staging Area 5S, Discharge 1, midpoint sample, right side	PCBs	< 0 1 µg/L	No Action Limit	-
W_SA5S_EffluA_0001					Staging Area 5S, Discharge 1, effluent sample, right side	PCBs, TSS, P	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L, P=0 42 mg/L, No Action Limit
W_SA5S_MidB_0001					Staging Area 5S, Discharge 1, midpoint sample, left side	PCBs	< 0 1 µg/L	No Action Limit	-
W_SA5S_EffluB_0001					Staging Area 5S, Discharge 1, effluent sample, left side	PCBs, TSS, P	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L, P=0 32 mg/L, No Action Limit

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Wastewater Samples (continued)									
W_SA5S_Influ_0002	06/09/08	06/10/08	082255	KAR Labs	Staging Area 5S, Discharge 2, influent sample	PCBs	0 1 µg/L	No Action Limit	-
W_SA5S_MidA_0002					Staging Area 5S, Discharge 2, midpoint sample, right side	PCBs	< 0 1 µg/L	No Action Limit	-
W_SA5S_EffluA_0002					Staging Area 5S, Discharge 2, effluent sample, right side	PCBs, TSS, P	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L, P=0 30 mg/L, No Action Limit
W_SA5S_MidB_0002					Staging Area 5S, Discharge 2, midpoint sample, left side	PCBs	< 0 1 µg/L	No Action Limit	-
W_SA5S_EffluB_0002					Staging Area 5S, Discharge 2, effluent sample, left side	PCBs, TSS, P	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L, P=0 30 mg/L, No Action Limit
W_SA5S_Influ_0003	06/10/08	06/11/08	082258	KAR Labs	Staging Area 5S, Discharge 3, influent sample	PCBs	< 0 1 µg/L	No Action Limit	-
W_SA5S_MidA_0003					Staging Area 5S, Discharge 3, midpoint sample, right side	PCBs	< 0 1 µg/L	No Action Limit	-
W_SA5S_EffluA_0003					Staging Area 5S, Discharge 3, effluent sample, right side	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L, P=0 20 mg/L, No Action Limit
W_SA5S_MidB_0003					Staging Area 5S, Discharge 3, midpoint sample, left side	PCBs	< 0 1 µg/L	No Action Limit	-
W_SA5S_EffluB_0003					Staging Area 5S, Discharge 3, effluent sample, left side	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L, P=0 25 mg/L, No Action Limit
W_SA5S_Influ_0004	06/11/08	06/12/08	082289	KAR Labs	Staging Area 5S, Discharge 4, influent sample	PCBs	< 0 1 µg/L	No Action Limit	-
W_SA5S_MidA_0004					Staging Area 5S, Discharge 4, midpoint sample, right side	PCBs	< 0 1 µg/L	No Action Limit	-
W_SA5S_EffluA_0004					Staging Area 5S, Discharge 4, effluent sample, right side	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L
[W_SA5S_Dup_0001]						[PCBs, TSS]	[< 0 1 µg/L]	[Monthly Average of 2 6 x 10-5 µg/L]	[None TSS = <4 mg/L, Action Limit = 45 mg/L]
W_SA5S_MidB_0004					Staging Area 5S, Discharge 4, midpoint sample, left side	PCBs	< 0 1 µg/L	No Action Limit	-
W_SA5S_EffluB_0004					Staging Area 5S, Discharge 4, effluent sample, left side	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L

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Wastewater Samples (continued)									
W_SA5S_Influ_0005	06/12/08	06/13/08	082315	KAR Labs	Staging Area 5S, Discharge 5, influent sample	PCBs	< 0 1 µg/L	No Action Limit	-
W_SA5S_MidA_0005					Staging Area 5S, Discharge 5, midpoint sample, right side	PCBs	< 0 1 µg/L	No Action Limit	-
W_SA5S_EffluA_0005					Staging Area 5S, Discharge 5, effluent sample, right side	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA5S_MidB_0005					Staging Area 5S, Discharge 5, midpoint sample, left side	PCBs	< 0 1 µg/L	No Action Limit	-
W_SA5S_EffluB_0005					Staging Area 5S, Discharge 5, effluent sample, left side	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA5S_Influ_0006	06/13/08	06/16/08	082340	KAR Labs	Staging Area 5S, Discharge 6, influent sample	PCBs	< 0.1 µg/L	No Action Limit	-
W_SA5S_MidA_0006					Staging Area 5S, Discharge 6, midpoint sample, right side	PCBs	< 0 1 µg/L	No Action Limit	-
W_SA5S_EffluA_0006					Staging Area 5S, Discharge 6, effluent sample, right side	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA5S_MidB_0006					Staging Area 5S, Discharge 6, midpoint sample, left side	PCBs	< 0 1 µg/L	No Action Limit	-
W_SA5S_EffluB_0006					Staging Area 5S, Discharge 6, effluent sample, left side	PCBs, TSS	< 0 1 µg/L	Monthly Average of 2 6 x 10-5 µg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L
PCB Wipe Samples									
Frac Tank 01	06/19/08	06/20/08	082437	KAR Labs	Temporary holding tank at Staging Area 4N	PCBs	< 0 1 µg/100 cm^2	10 µg/100 cm^2 [2]	None
Frac Tank 02					Temporary holding tank at Staging Area 5S	PCBs	< 0 1 µg/100 cm^2	10 µg/100 cm^2 [2]	None

Notes:

1 - Split sample collected by USEPA
2 - The decontamination standard for non-porous materials previously in contact with PCB-containing liquid according to Federal Regulations (Title 40, Chapter 1, Subchapter R, Part 761 79 3)
J - The compound was positively identified, however, the associated numerical value is an estimated concentration only
* USEPA split samples are shown in bold and italicized font
* Duplicate samples are shown in brackets
* Analytical results have not been validated

BS - bank sample
NR - not received
P - Phosphorus
PCBs - Polychlorinated Biphenyls
RA - Removal Area
TAL - TestAmerica Laboratories
TSCA - Sample collected from portion of sampling grid with PCB concentrations greater than 50 mg/kg prior to excavation
TSS - Total Suspended Solids
UA - Upland Area
cm^4 - square centimeters
mg/kg - milligrams per kilogram
mg/L - milligrams per liter
µg/L - micrograms per liter